

USA-74-24B  
(Rev. 05/01)CRIMINAL DOCKET  
SEALED

No. 4:19-CR-450-S1

HOUSTON DIVISION

USAO Number:

Magistrate Number:

SUPERSEDING INDICTMENT

Filed 8 /6 /2019

Judge:

Rosenthal

UNITED STATES of AMERICA

ATTORNEYS:

VS.

RYAN K. PATRICK, USA (713) 567-9000

Robert Johnson, AUSA (713) 567-9000

	Appt'd	Private
JEFFREY STERN(1- 11, 19-21)	<input type="checkbox"/>	<input type="checkbox"/>
FREDERICK MORRIS(1, 6-11)	<input type="checkbox"/>	<input type="checkbox"/>
LAMONT RATCLIFF(1, 16-18)	<input type="checkbox"/>	<input type="checkbox"/>
DEBORAH BRADLEY(1, 12-15)	<input type="checkbox"/>	<input type="checkbox"/>
RICHARD PLEZIA(1)	<input type="checkbox"/>	<input type="checkbox"/>

Ct. 1: Conspiracy to Defraud the United States [18 USC § 371]

CHARGE: Ct. 2-5, 12-18: Willfully Filing False Tax Return [26 USC § 7206(1)]

(TOTAL)  
(COUNTS:) Cts. 6 -11: Aiding and Assisting in the Preparation and Presentation of False Tax Return [26 USC § 7206(2)]

( 21 ) Cts. 19 &amp; 20: Witness Tampering [18 USC § 1512(b)(2)(B)]

Ct. 21: Obstruction of Justice [18 USC 1503]

PENALTY: Ct. 1: 5 years imprisonment; a \$250,000/\$500,000 fine or twice the gross gain or loss; 3 years SRT; \$100 SA.  
 Cts. 2-18: 3 years imprisonment; \$250,000.00 Fine; 1 year SRT; \$100.00 SA.  
 Cts. 19-20: 20 years imprisonment; \$250,000 Fine; 3 years SRT, \$100.00 SA.  
 Ct. 21: 10 years imprisonment, \$250,000.00 Fine; 3 years SRT, \$100.00 SA.

 United States Courts  
 Southern District of Texas  
 FILED

AUG 06 2019

David J. Bradley, Clerk of Court

☐ In Jail☐ On Bond☒ No ArrestNAME & ADDRESS  
of Surety:

PROCEEDINGS: